



# Privacy Policy

## 1.3 How do we handle your data?

Kobre & Kim will take all reasonable steps necessary to ensure that your personal data is accurate and kept up to date and that any personal data that is transferred to others will be processed securely and in accordance with this privacy policy. In order to provide you with requested services or data, we may need to transfer your personal data to firm locations and/or service providers based in various countries. This does not diminish your rights.

Kobre & Kim only transfers personal data to third parties when appropriate legal considerations and agreements have been put into place before the personal data is transferred.

We will not sell, resell, lease, or license your personal data to any third parties. However, we may, if required for the purpose(s) for which your personal data was collected and processed, share it with our service providers, for the specific scope of their provision of services on our behalf to help with our business activities. These companies are authorized to use your personal data only as instructed by us in a manner that is necessary to provide these services to us.

No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All other categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

We reserve the right to transfer any data we have about you in the event that we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to ensure that the transferee use the personal data you have provided through the website in a manner that is consistent with this privacy policy.

## 1.4 Data retention and data security

We only retain data for as long as necessary in light of the following circumstances:

If we are legally or contractually obligated to do so

If it is required to provide you with a service that you have requested

If there is business value and the interests of the business do not outweigh the interests of the individual

If there is historical value of public interest

The security of your personal data is important to us. We follow generally accepted standards to protect the data submitted to us, both during transmission and once it is received. Kobre & Kim has policies and technical measures in place designed to protect your personal data against unauthorized access, accidental loss, and improper use and disclosure. If you have any questions about the security of your personal data, you may contact us at [privacypolicy@kobrekim.com](mailto:privacypolicy@kobrekim.com).

Our data security standards are compliant to the standard necessary for each of our operating client regions.

## 1.5 Your rights

Kobre & Kim endeavor to act on all requests we receive from individuals in relation to our data processing activities, irrespective of where they reside. An individual can access, correct or request the deletion of their personal data via the email address at the end of this section.

However, EU and Switzerland, Dubai, and California residents have certain rights afforded to them as data subjects under the General Data Protection Regulation (GDPR), the DIFC Data Protection Law, and the California Consumer Protection Act (CCPA), respectively. Kobre & Kim's compliance with the GDPR is overseen by the UK Information Commissioner's Office, while its compliance with the CCPA is overseen by the California Office of the Attorney General. The DIFC Commissioner of Data Protection oversees Kobre & Kim's compliance with the DIFC Data Protection Law. Data subject rights include:

The right to be informed

The right of access

The right to rectification

The right to erasure

The right to restrict processing

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The right to data portability

The right to object

The right to make a complaint to the Supervisory Authority (Information Commissioner's Office or, for Dubai residents, the Commissioner of Data Protection)

The right to non-discrimination

If you would like more information on these rights, refer to the guidance found on the Information Commissioner's website, which can be found here: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>, or the California Office of the Attorney General's website, which can be found here: <https://oag.ca.gov/privacy/ccpa>

Individuals may submit a request to exercise these rights by sending the request to our Data Protection Officer via one of the contact methods identified at the beginning of this privacy policy. Such request should, at a minimum, contain:

Your full name, address and any other details you wish to give to help identify you and the information you want

The nature of your request (i.e. access, rectification, etc.), and depending on the nature of it, which time period the request pertains to (date from, date to)

We will respond to all data subject requests within 30 days. If the request requires more than 30 days to investigate, we will notify you why we need more time. It may take us up to 3 months to respond to complex requests. You will not be charged a fee for exercising your rights.

We may deny a request under the following circumstances:

If the request is not legal

If the identity of the requester cannot be verified

If we have an overriding legitimate interest

If you would like to make a complaint to the Information Commissioner's Office, you may do so via:

Website: <https://ico.org.uk/concerns/>

Phone: +44 303 123 1113

If you would like to make a complaint to the DIFC Commissioner of Data Protection, you may do so via:

The Commissioner of Data Protection

Mail: Dubai International Financial Centre Authority

Level 14, The Gate

P.O. Box 74777

Dubai

United Arab Emirates

Website: [commissioner@dp.difc.ae](mailto:commissioner@dp.difc.ae)

Phone: +971 4 362 2222

## Access

Kobre & Kim will respond to any inquiries regarding whether we hold any of your personal data. You may access, correct, or request the deletion of your personal data by contacting us at [privacypolicy@kobrekim.com](mailto:privacypolicy@kobrekim.com). In certain circumstances, we may retain your personal data in order to continue providing necessary services or to comply with legal requirements. We will respond to these requests within a reasonable timeframe.

If you have an unresolved privacy or data-use concern that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

## Choice

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If personal data covered by this privacy policy is to be used for a new purpose that is materially different from that for which the personal data was originally collected or subsequently authorized, or is to be disclosed to a non-agent third party in a manner not specified by this policy, Kobre & Kim will provide you with an opportunity to choose whether to have your personal data so used or disclosed. Requests to opt out of such uses or disclosures of personal data should be sent to us as specified in Section 1.2 Contact Information in this policy.

Certain personal data, such as information about medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, is considered "Sensitive Personal Data" under certain data privacy laws and principles to which we are subject. Kobre & Kim will not use Sensitive Personal Data for a purpose other than the purpose for which it was originally collected or subsequently authorized by the data subject unless Kobre & Kim has received such data subject's affirmative and explicit consent.

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